

U.S. Department of Justice



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 6, 2023

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: **United States v. James Velissaris,**
22 Cr. 105 (DLC)

Dear Judge Cote:

The parties write to jointly propose a process for determining the reasonableness of the attorney's fees sought in the above-captioned case, per the Court's June 27, 2023 Order. (Dkt. 131).

There are three disputes that the Court must resolve regarding restitution for attorney's fees. First, the parties disagree about the categories of legal expenses for which restitution is owed under the Mandatory Victim Restitution Act ("MVRA"). Second, the parties disagree about whether specific expenses fall within the MVRA's categories. Third, the parties disagree about whether specific expenses are excessive, even if they fall within a category covered by the MVRA. The first question is already fully briefed for the Court. The second and third questions have not yet been fully briefed.

Accordingly, the parties jointly propose the following process: by July 14, 2023, the Government shall provide the defendant and the Court with invoices that support the victims' claims for legal expenses. By July 21, 2023, the defendant shall submit a letter identifying the specific portions of the invoices that it believes are not reasonable or are not covered by the

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MVRA, along with any additional legal argument he deems necessary. By July 28, 2023, the Government shall respond to this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: _____ /s/
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/s/
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s- ordered.

Denise Cote
7/6/23